

# COLEMAN LAW FIRM, P.C.

RONALD D. COLEMAN  
973 264 9611  
RCOLEMAN@COLEMANLAW-PC.COM  
50 PARK PLACE | NEWARK NJ 07102  
Admitted in New York and New Jersey

January 13, 2026

## BY ECF

Hon. Denise J. Casper, U.S.D.J.  
United States District Court  
District of Massachusetts  
John Joseph Moakley U.S. Courthouse  
1 Courthouse Way, Suite 2300  
Boston, Massachusetts 02210

Re: **MMAS Research LLC, v. Boston Children Hospital *et al.***  
**Case No. : 1:24-cv-12108-DJC**

Dear Judge Casper:

We represent plaintiff in the referenced matter and write in connection with the upcoming January 15<sup>th</sup> deadline to file a motion for leave to file a second amended complaint (Doc. 85).

Our proposed pleading and supporting motion are essentially ready to file, but we as the Court is aware, Local Rule 15.1(b) requires service, "in the manner contemplated by Fed. R. Civ. P. 5(b)," of the motion to amend upon the proposed new party at least 14 days in advance of filing the motion, together with a separate document stating the date on which the motion will be filed."

Plaintiff can effectuate Rule 5(b) service on the anticipated new parties by the 15<sup>th</sup>, but obviously will not be able to actually file the motion by that date because of the 14-day waiting period. We write to request the Court's guidance concerning this matter, in light of the approaching deadline.

Respectfully submitted,



Ronald D. Coleman